

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Case No. 1:20-mj-84

JOHN CAMERON DENTON,
a/k/a “Rape”
a/k/a “Death”
a/k/a “Tormentor”

Defendant.

CONSENT MOTION TO EXTEND TIME FOR INDICTMENT

COMES NOW the United States of America by its attorneys, G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, and Carina A. Cuellar, Assistant United States Attorney, with the express consent of the defendant, and with advice of defense counsel, and respectfully moves this Court to extend the time to indict this case from June 25, 2020 until July 23, 2020. In support thereof, the parties state as follows:

1. On February 26, 2020, the defendant was arrested in the Southern District of Texas and made his initial appearance. On February 27, 2020, the defendant waived his identification hearing and was ordered transferred to the Eastern District of Virginia.

2. On March 10, 2020, the defendant made his initial appearance in the Eastern District of Virginia. On March 13, 2020, the defendant appeared for his combined preliminary and detention hearing before the Honorable Theresa Carroll Buchanan. After the defendant waived his preliminary hearing, the Court found that there was probable cause in support of the criminal complaint. The Court then held the detention hearing. After hearing argument and

considering the facts articulated in the affidavit in support of the criminal complaint, the Court determined that the defendant posed a continuing threat to the community, and ordered the defendant detained.

3. The Speedy Trial Act requires that a defendant be indicted within thirty days of the defendant's arrest. *See* 18 U.S.C. § 3161(b). The Court granted multiple extensions of this time. The current extension of the time to indict is until June 25, 2020.

4. The United States has presented a plea agreement to the defendant; however, defense counsel has been unable to review the entirety of the plea materials and certain discovery with the defendant because of the measures put in place to prevent the spread of Coronavirus 2019 ("COVID-19") at the Alexandria Detention Center. The defendant would like more time to consider the plea offer and review discovery.

5. The defendant hereby agrees to waive any objections under the Speedy Trial Act and to extend the government's time to file an indictment in this case through and including July 23, 2020. The waiver is made knowingly, intentionally, and voluntarily by the defendant, and with full knowledge of the provisions of the Speedy Trial Act, Title 18, United States Code, Sections 3161, *et seq.*, and with the advice and consent of counsel.

6. The defendant expressly understands that his waiver is not predicated upon any promises, agreements, or understandings of any kind between the government and the defense in this case, and that nothing contained herein shall be construed to preclude the government from proceeding against the defendant during or after the time covered by this waiver.

WHEREFORE, the parties request that the time to indict this case be extended through and including July 23, 2020, and that such time be excluded in computing the time within which an indictment must be filed pursuant to Title 18, United States Code, Section 3161(h).

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: /s/ Carina A. Cuellar
Carina A. Cuellar
Assistant United States Attorney